



California Regional Water Quality Control Board

Los Angeles Region



Alan C. Lloyd, Ph.D.
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

March 15, 2005

Ms. Rita L. Robinson, Director
Bureau of Sanitation
Department of Public Works
City of Los Angeles
433 South Spring Street
Los Angeles, CA 90013

PUBLIC REVIEW PERIOD AND TENTATIVE APPROVAL OF CHANGES TO THE SANTA MONICA BAY SHORELINE MONITORING REQUIREMENTS CONTAINED IN THE MONITORING AND REPORTING PROGRAM UNDER THE LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT (NPDES NO. CAS004001) AND THE SANTA MONICA BAY BEACHES BACTERIAL TMDLS

Dear Ms. Robinson:

We have received your letter dated December 2, 2004 requesting approval for proposed changes to the shoreline monitoring requirements contained in the monitoring and reporting program under the Los Angeles County Municipal Storm Water Discharge Permit (NPDES No. CAS004001) to conform to those of the Santa Monica Bay Beaches Bacterial TMDLs.

This letter is to notify the City of Los Angeles (City) that we are tentatively approving the changes described below. However, Part 6.C of the Los Angeles County Municipal Storm Water Permit requires a 30-day public comment period prior to the Executive Officer's final approval of these changes. Regional Board staff will consider any comments received before the close of the comment period before finalizing changes to the monitoring and reporting program and issuing a final letter of approval for the City's requested changes outlined in the December 2, 2004 letter.

The public comment period will begin when the public notice is published in the Los Angeles Times. Your staff will be notified immediately prior to the opening of the public comment period.

The Los Angeles County Municipal Storm Water Permit requires that the City of Los Angeles monitor eighteen shoreline stations to determine compliance with bacteria water quality objectives for water contact recreation. The monitoring and reporting program states that station locations may be modified based on recommendations from the Santa Monica Bay Restoration Project (now Commission, SMBRC) and approval from the Regional Board Executive Officer. It also states that shoreline monitoring frequencies (six times per week) may be modified as recommended by the SMBRC Technical Advisory Committee and the Los Angeles County Department of Health Services.

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In 2002, the Regional Board adopted two TMDLs to address bacteria impairments at the beaches along Santa Monica Bay. One of the requirements of these TMDLs was to develop a coordinated shoreline monitoring plan to track compliance with TMDL requirements. The TMDLs require a minimum of weekly monitoring at all existing shoreline monitoring stations¹ and also require establishment of new monitoring sites at major drains or natural creeks. *The Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan* (CSMP) prepared by responsible jurisdictions and agencies under the TMDLs was approved by the Regional Board's Executive Officer in April 2004. The general elements of the plan include weekly monitoring at 67 shoreline sites along the beaches of Santa Monica Bay. Fifty sites are existing monitoring sites, while 17 are newly established sites. Where the site is adjacent to a major drain or natural creek, the compliance point is the wave wash (i.e. point zero).

At permit reissuance, the monitoring requirements for the Santa Monica Bay Beaches Bacterial TMDLs in their entirety and any amendments to these requirements will be incorporated into the Los Angeles County Municipal Storm Water Discharge Permit as monitoring requirements to determine compliance with the Santa Monica Bay Beaches Bacterial TMDLs. Until permit reissuance, the following interim changes are tentatively approved to conform the current shoreline monitoring done by the City of Los Angeles per requirements in the monitoring and reporting program of the Los Angeles County Municipal Storm Water Discharge Permit to that required under the Santa Monica Bay Beaches Bacterial TMDLs.

Your December 2, 2004 letter requested that we approve the following changes, which were reviewed and approved by the SMBRC Technical Advisory Committee at its November 23, 2004 meeting.

- Reduce the daily (i.e., six times per week) sampling frequency to five times per week with the requirement that sampling must be conducted on Saturdays with days off on either Sundays and Mondays or Sundays and Tuesdays;
- Retain a monitoring frequency of five times per week for nine of the eighteen sites currently listed in the monitoring and reporting program. These sites require more frequent monitoring based on historical water quality, which based on available data has been shown to be worse than the reference beach used in the Santa Monica Bay Beaches Bacterial TMDLs. These sites include S1, S2, S4, S5, S6, S7, S9, S10, and S16.
- Reduce to weekly monitoring nine of the eighteen sites currently listed in the monitoring and reporting program. Based on historical data, these sites have been shown to have water quality as good as or better than the reference beach used in the Santa Monica Bay Beaches Bacterial TMDLs. These sites include S3, S8, S11, S12, S13, S14, S15, S17, and S18.
- Reduce monitoring to five times per week at the two Inner Cabrillo Beach sites currently monitored by the City of Los Angeles to align the monitoring requirements of all shoreline stations monitored by the City.

¹ Those monitoring by the City of Los Angeles, County Department of Health Services and the County Sanitation Districts of Los Angeles County at the time of adoption of the Santa Monica Bay Beaches Bacterial TMDLs.



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- Increase monitoring frequency from weekly to five times per week at DHS 113 (Manhattan Beach at 28th Street) and DHS 115 (Herondo Avenue drain).
- Evaluate DHS 102 (Temescal Canyon), DHS 103 (Bel Air Bay Club), and DHS 104 (Montana Avenue) for stormwater impact and the necessity of increasing monitoring frequency to five times per week.
- Monitor additional sites at Mother's Beach in Marina del Rey and Inner Cabrillo Beach in the Los Angeles Harbor as required by forthcoming compliance monitoring plans for the Marina del Rey Bacterial TMDL and the Los Angeles Harbor Bacterial TMDL.

Finally, we want to reiterate that the financial responsibility for conducting shoreline monitoring at the eighteen stations as outlined in the monitoring and reporting program of the Los Angeles County Municipal Storm Water Discharge Permit, or the alternative set of shoreline monitoring sites outlined in this letter, currently rests on the City of Los Angeles. This responsibility will remain the City's until the Los Angeles County Municipal Storm Water Discharge Permit is reissued. During permit issuance, the City may request that the Regional Board assign financial responsibility for this shoreline monitoring to all responsible jurisdictions and agencies within the appropriate subwatershed.

If you should have any questions regarding this letter please feel free to call me at (213) 576-6605 or your staff may contact Carlos Urrunaga at (213) 620-2083 or Renee DeShazo at (213) 576-6783.

Sincerely,

Jonathan S. Bishop, P.E.
Executive Officer

cc: Dan Lafferty, County of Los Angeles Department of Public Works
Frank Wu, Co-chair, SMBBB TMDL TSC and County of Los Angeles Dept. of Public Works
Shahram Kharaghani, City of Los Angeles Bureau of Sanitation
Masahiro Dojiri, Co-chair, SMBBB TMDL TSC and City of Los Angeles Bureau of Sanitation

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